

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

In re VASO ACTIVE PHARMACEUTICALS
SECURITIES LITIGATION

)
)
)
)
—)
)
)
)
)
)

Master Docket No.04-10708(RCL)

This Document Relates To:

ALL ACTIONS

MOTION FOR DISTRIBUTION OF CLASS SETTLEMENT FUND

PLEASE TAKE NOTICE, that, upon the annexed Affidavit of Anya Verkhovskaya of A.B. Data, Ltd. (“A.B. Data”), the claims administrator for the Settlement, the Declaration of Kay E. Sickles of Schiffrin Barroway Topaz & Kessler, LLP, on behalf of Lead Counsel, and upon all prior proceedings herein, the undersigned hereby move this Court for an Order pursuant to Rule 23(e) of the Federal Rules of Civil Procedure: (i) approving the administrative determinations of A.B. Data accepting and rejecting claims submitted herein; (ii) directing distribution of the Net Settlement Fund, in two separate payments, to Class Members whose Proof of Claim and Release forms (“Proofs of Claim”) have been accepted; (iii) approving the plan for re-distribution and/or donation of any funds remaining in the Net Settlement Fund following the distribution to Class Members; (iv) authorizing destruction of paper copies of Proofs of Claim one year after the second payment of the Net Settlement Fund, and authorizing destruction of electronic copies of claim records three years after the second payment of the Net Settlement Fund; and (v) for such other and further relief as this Court deems appropriate.

WHEREFORE, Lead Plaintiff respectfully requests that the Court enter an Order in the form of the proposed Order Authorizing Distribution annexed hereto as Exhibit A.

Dated: March 22, 2007

Respectfully Submitted,

/s/ Thomas G. Shapiro

Thomas G. Shapiro, Esq. (BBO#454680)

SHAPIRO HABER & URMY LLP

Exchange Place

53 State Street

Boston, Massachusetts 02109

Telephone: (617) 439-3939

**SCHIFFRIN BARROWAY TOPAZ &
KESSLER, LLP**

Kay E. Sickles, Esq.

280 King of Prussia Road

Radnor, PA 19087

Telephone: (610) 667-7706

Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on March 22, 2007.

/s/ Thomas G. Shapiro

Thomas G. Shapiro